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Melissa E. Newman
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March 11, 2005

RECEIVED

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Room TW B-204
Washington, DC 20554

MAR 11 2005

Federal Communications Commission
Office of Secretary

Re: In the Matter of Reporting Requirements for U.S. Providers of International Telecommunications Services; Amendment of Part 43 of the Commission's Rules.
(IB Docket No. 04-112)

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Federal Communications Commission's ("FCC") rules,¹ Qwest Communications Corporation ("Qwest") hereby submits this written ex parte in the above-captioned proceeding.

The record in this proceeding demonstrates that the Commission should eliminate the reporting requirements contained in sections 43.61 and 43.82 of the Commission's rules. Qwest agrees with Verizon that these reports are burdensome and no longer necessary in light of today's competitive international marketplace.² The benefits of these reports are vastly outweighed by the burdens they impose, particularly given the fact that carriers would continue to report their international service revenues pursuant to the FCC's Form 499-A Telecommunications Reporting Worksheet.

If the Commission determines that any of the section 43.61 or 43.82 reporting requirements are still warranted, it should streamline the reporting process as much as possible. MCI, Verizon and other commenters suggest ways in which the Commission could streamline and simplify section 43.61 and 43.82 reporting obligations, in addition to those proposed in the

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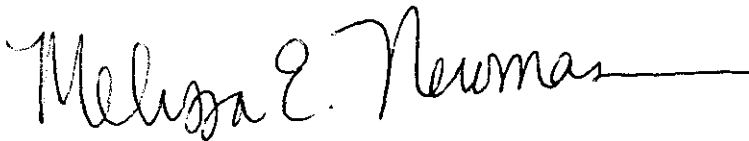
¹ 47 C.F.R. §1.1206.

² See Verizon Reply Comments, filed herein August 23, 2004, at 2-3.

March 11, 2005
Marlene H. Dortch
Page 2

Notice of Proposed Rulemaking (19 FCC rcd 6460).³ Qwest also agrees with the Commission's proposal to consolidate the circuit status report with the traffic and revenue report. In no event should the Commission adopt any changes to the reporting requirements that would make them more burdensome than they are today.

Respectfully submitted,

A handwritten signature in black ink, reading "Melissa E. Newman", followed by a horizontal line.

Melissa E. Newman
Vice President – Federal Regulatory
Qwest

Copy to:
Linda Blake - FCC
John Copes - FCC
Joann Ekbal - FCC
Claudia Fox - FCC
Cathy Hsu - FCC
David Krech - FCC
Susan O'Connell - FCC
Peggy Reitzel - FCC

³ See, e.g., MCI Comments, filed herein July 26, 2004, at 2-5; Verizon Comments, filed herein July 26, 2004, at 8-12.